Hingtgen, Robert J

To:

Bennett, Jim

Subject:

RE: EL MONTE SAND MINING AND NATURE PRESERVE; PDS2015-MUP-98-014W2,

PDS2015-RP-15-001, LOG NO. PDS2015-ER-98-14-016B

From: Renee Owens [mailto:renee@wildlifezone.net]

Sent: Monday, September 14, 2015 1:47 PM

To: Bennett, Jim

Subject: EL MONTE SAND MINING AND NATURE PRESERVE; PDS2015-MUP-98-014W2, PDS2015-RP-15-001, LOG NO.

PDS2015-ER-98-14-016B

Dear Mr. Bennett,

Please accept the following as my official comments in response to the NOP for the El Monte Sand Mining Project referenced herein.

- 1. I cannot emphasize enough the need for a completely new analysis of the biological and hydrological resources that may be impacted by this project. A supplementary or subsequent EIR will not be adequate, and will not reflect the potential changes that can and do occur among habitats, sensitive species populations, and during times of drought and projected El Nino. Also, any biological or hydrological data that has been collected previously by any professional environmental associates of Michael Beck should be excluded from the analysis due to risk of biased reporting as a result of professional conflict of interest, given that Mr. Beck is part of a lawsuit on behalf of the Sand Mine client and has heavily lobbied as a proponent of the client. New surveys should not only include ESA listed species, but also other key, non-listed species present in the area, including bats and raptors.
- 2. The EIR must include very specific details and a specific mitigation and restoration monitoring plans regarding **exactly** how the Project plans to successfully mitigate for biological and hydrological impacts, and how restoration and reclamation will be carried out over the short and long term. For the EIR to defer to provide any such details for such in the future would be unacceptable, given the demonstrated difficulties and failures of other sand mines in the region regarding successful biological restoration/reclamation, and because reclamation of this watershed has been touted widely as a primary reason for accepting this project as environmentally viable and favorable over the long term.
- 3. The EIR must specifically address cumulative impacts to hydrology, including impacts to the aquifer, wells, and habitat and wildlife dependant on the aquifer maintaining a specific level.
- 4. The EIR should specifically address hazards associated with particulate emissions and soil disruption from a site known to contain Valley Fever, a health risk that is notorious for being under-recognized and under-reported.
- 5. The EIR should directly and specifically address impacts regarding contributions to greenhouses gases associated with aggregate mining and cement manufacture, including increased truck traffic.
- 6. The EIR should seriously consider visual and aesthetic impacts as important considerations for proposed industrial project in a Valley that is a known popular recreational destination for people who enjoy non-consumptive, scenic vista and wildlife viewing, hiking, and equestrian trails. How does the client intend to mitigate the ongoing noise and visual impacts to such, for not only nearby residents, but visitors to the area who seek peace and quiet and will be met instead with industrial sand mining construction impacts, dust, noise, and related disruption?

Thank you,

Renée Owens

Founder / Principal Sage Wildlife LLC Environmental Consulting since 1994

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